

**SAO**  
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**UNITED STATES DISTRICT COURT**

**DISTRICT OF, NEVADA**

HILLCREST INVESTMENTS, LTD., a  
Canadian Corporation; AMERGOSA  
ENTERPRISE, LLC.,  
Plaintiffs,

vs.

AMERICAN BORATE COMPANY a foreign  
corporation; AMERICAN BORATE COMPANY  
OF TEXAS a foreign corporation, STATE  
ENGINEER, STATE OF NEVADA,  
DEPARTMENT OF CONSERVATION AND  
NATURAL RESOURCES, DIVISION OF  
WATER RESOURCES, A Nevada Political  
Subdivision; RAMM Corporation, a Nevada  
Corporation; UNITED STATES FISH AND  
WILD SERVICE a division of the UNITED  
STATES; NATIONAL PARK SERVICE, a  
division of the UNITED STATES; and DOES I-  
V, ROES VI-X,

Defendants.

Case No 2:21-cv-00964-RFB-NJK

**STIPULATION TO EXTEND DEADLINE  
TO FILE RESPONSE TO  
DEFENDANTS' AMERICAN BORATE  
COMPANY AND AMERICAN BORATE  
COMPANY OF TEXAS' RENEWED  
MOTION FOR SANCTIONS AND REPLY  
TO RESPONSE TO MOTION TO  
RECONSIDER**

**(FIFTH REQUEST)**

**COMES NOW**, Plaintiffs **HILLCREST INVESTMENTS, LTD. and AMERGOSA  
ENTERPRISE, LLC** ("Plaintiffs") and Defendants, **AMERICAN BORATE COMPANY AND  
AMERICAN BORATE COMPANY OF TEXAS** (hereafter "American Borate") by and  
through their respective attorneys of record hereby stipulate and agree as follows:

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1 The parties now make this fifth request for an extension for the deadline for Plaintiffs to file the  
2 Response and the Reply, due to counsel's workload and scheduling conflicts, caused in part by  
3 Plaintiffs' counsel's unfortunate continued illness. The parties request the extension until August  
4 19, 2022. This is the parties' fifth request.  
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6 **LEONARD LAW PC**

7  
8 /s/ Debbie Leonard

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10 Debbie Leonard  
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Reno, Nevada 89502  
(775) 964-4656

13 Attorney for American Borate  
14 Company and American Borate  
Company of Texas

**LAW OFFICES OF BYRON  
THOMAS**

/s/ Byron E. Thomas

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3275 S. Jones Blvd. Ste. 104  
Las Vegas, NV 89146

Attorney for Plaintiffs

15 **IT IS SO ORDERED.**

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18 **RICHARD E. BOULWARE, II**  
19 **United States District Court**

20 DATED this 15th day of August, 2022.  
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